

works audible and transmitting said performance of the works, by means of a device or process, to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publically" perform); and

(D) Display the copyrighted works, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the works nonsequentially and transmitting said display of the works by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publically" display).

33. Defendant's infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, Plaintiff respectfully requests that the Court:

(A) Permanently enjoin Defendant and all other persons who are in active concert or participation with Defendant from continuing to infringe Plaintiff's copyrighted works;

(B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's works from each of the computers under Defendant's possession, custody or control;

(C) Order that Defendant delete and permanently remove the infringing copies of the works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages per infringed Work pursuant to 17 U.S.C. § 504-(a) and (c);

(E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

(F) Grant Plaintiff any other and further relief this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

By: Jacqueline M. James

Jacqueline M. James, Esq. (1845)

The James Law Firm

445 Hamilton Avenue

Suite 1102

White Plains, New York 10601

T: 914-358-6423

F: 914-358-6424

E-mail: jjameslaw@optonline.net

Attorneys for Plaintiff

File Hashes for IP Address 74.68.99.209

ISP: Time Warner Cable

Physical Location: New York, NY

Hit Date UTC	File Hash	Title
09/21/2014 23:20:43	938747CF852C2461672AB4BEF6B9EB8DFE5CCFED	Summertime Lunch
08/15/2014 09:15:31	1053FC809917865BF7F1DD40E5CDE04BEF3C2A83	Paint Me Beautiful
08/14/2014 18:28:07	9AE8C942F4E9D5B23CBD7A8DB396ADFEEAA96191	Breakfast At Eves
08/02/2014 23:35:09	5BD21536ACB94D27432F03907AD824469C1E0C4B	So Young
07/29/2014 10:17:55	D7AF4A858B0260F911F71293CA9B21A9B1C2DB8E	Yours Forever
07/29/2014 09:43:28	4AD2B662A96BE19DD71CEFB3D71C167B4F22BC70	Precious Metal
07/29/2014 04:07:06	97158B960497ACDEAE3933D112E2A7F3993243D8	Rock Me Baby
07/29/2014 02:05:52	509E83D6E70C2BF9182D1D55AA1F06EC626BB931	Listen To Me Cum
07/28/2014 18:14:52	A21F8FE9145E99F779B2170978CBF87E31053685	Highrise Rendezvous
07/26/2014 14:21:21	5EDF14B202FD7ACF5FCD05B19B5AF531938CF712	California Dreams
07/07/2014 04:49:15	FC7A9F5AB2706511A5941D97920612730F7793A5	Sexy In The City
07/07/2014 01:16:31	63CE8A4A8FFD1B48A58A364E4D93E06B0D2F701D	Give Me More Part 2
07/07/2014 00:36:34	34429A06336560BDEDA89FD870744967914949A1	They Seem so Sweet
07/06/2014 23:18:35	29C347E3BDA14E2181ABA26FE21B245FA0285309	Lovers Way
07/06/2014 23:06:06	9B18995FF4BF5957CB9CB3A4E3119A82475181C3	Cut Once More Please
07/06/2014 22:24:17	02744D186E0956E552C9AD10D76F915C46AA2D0C	Chloe Loves Carl Part 2
07/06/2014 22:22:48	4F6D7C009DDC1DBE97EF793B9E87C7FAECE92C53	Tie Her Up For Me
07/01/2014 02:29:38	20575564BE7412871171774048F19C75EFF77DFC	Coming Late
07/01/2014 02:00:10	FA4374990E72805802BC7B78F0491D9793B917CB	Come Close
06/22/2014 01:54:58	6AFD2DF9EC6215AD8AC6E9B14D5783E1FCC795C9	Deep Blue Passion
06/21/2014 11:44:58	D33677809972FB0E07D88E8098768B50B8443B8B	Enjoy My Backdoor
06/20/2014 22:54:50	AEDF4095F43F6F6471063FC7ACF32F7FD52227EC	Just Jennifer

EXHIBIT A

SNY26

Hit Date UTC	File Hash	Title
06/15/2014 03:08:28	C84CEE035F21CF4AD3452F4ED6893F25FEDAB2CC	Go Down On Me
06/03/2014 04:08:34	A632A578F7401E1A9A7AE25DC66DC266C23FBFEE	Blindfold Me Baby
06/01/2014 03:30:55	6EC4EAC1DF8D6C9F6A7C69FB03130A8273DBACF2	Epic Love
05/28/2014 13:24:43	600CD4ED9B453A8704B6162DA5E84E36CBE9D539	I Will See You In The Morning
05/27/2014 15:27:48	BE8D1D6FC734C53D97F77FDE5769D86B2DE01DCF	Floating Emotions
05/24/2014 13:56:47	1CD14FD8B9747783040E8A2B94F5844B408EC5C1	Dark Desires
05/24/2014 13:36:24	C7AE0D720AB84C87C250BE15CB00C54FB013B79E	Meet My Lover From Austria
05/24/2014 13:06:37	3E4968CC6071DC42C22F6E24DDD4532F02D1B59E	Zeppelin on Fire
05/09/2014 21:06:34	E78DE444F2155533DD43D140355A83BC32D979DA	Not Alone
05/09/2014 20:04:21	90C07F6C6CBD7F2A454C160CBA3D5BB640A6F1B8	Putting On A Show For You
05/09/2014 18:43:27	83CA6D53AA3BF1F4E69C0CA7073D885B1A48531E	Au Paradis
05/09/2014 17:53:36	0A05FD57476DB076D85453C9C23FEF5794899100	Perfect Timing
05/09/2014 16:25:59	A1B0A9B8D530009523AD651AD83C5E14645DB259	Knock On My Door

Total Statutory Claims Against Defendant: 35

Copyrights-In-Suit for IP Address 74.68.99.209

ISP: Time Warner Cable

Location: New York, NY

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Au Paradis	PA0001895846	05/05/2014	05/16/2014	05/09/2014
Blindfold Me Baby	PA0001902971	05/30/2014	06/06/2014	06/03/2014
Breakfast At Eves	PA0001909480	08/06/2014	08/26/2014	08/14/2014
California Dreams	PA0001780564	03/12/2012	03/12/2012	07/26/2014
Chloe Loves Carl Part 2	PA0001906561	07/05/2014	07/14/2014	07/06/2014
Come Close	PA0001905140	06/23/2014	06/30/2014	07/01/2014
Coming Late	PA0001904286	06/19/2014	06/24/2014	07/01/2014
Cut Once More Please	PA0001905491	07/01/2014	07/02/2014	07/06/2014
Dark Desires	PA0001859658	07/10/2013	08/02/2013	05/24/2014
Deep Blue Passion	PA0001885168	03/21/2014	03/24/2014	06/22/2014
Enjoy My Backdoor	PA0001904149	06/13/2014	06/19/2014	06/21/2014
Epic Love	PA0001898091	05/25/2014	06/06/2014	06/01/2014
Floating Emotions	PA0001887126	04/05/2014	04/07/2014	05/27/2014
Give Me More Part 2	PA0001905479	06/29/2014	07/02/2014	07/07/2014
Go Down On Me	PA0001904131	06/11/2014	06/19/2014	06/15/2014
Highrise Rendezvous	PA0001908213	07/25/2014	07/31/2014	07/28/2014
I Will See You In The Morning	PA0001874746	01/14/2014	01/15/2014	05/28/2014
Just Jennifer	PA0001903842	06/09/2014	06/12/2014	06/20/2014
Knock On My Door	PA0001895763	05/09/2014	05/16/2014	05/09/2014
Listen To Me Cum	PA0001908211	07/19/2014	07/31/2014	07/29/2014
Lovers Way	PA0001905141	06/21/2014	07/02/2014	07/06/2014

EXHIBIT B

SNY26

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Meet My Lover From Austria	PA0001898094	05/17/2014	06/06/2014	05/24/2014
Not Alone	PA0001889410	04/09/2014	04/15/2014	05/09/2014
Paint Me Beautiful	PA0001908674	08/04/2014	08/11/2014	08/15/2014
Perfect Timing	PA0001895848	05/07/2014	05/16/2014	05/09/2014
Precious Metal	PA0001908248	07/27/2014	07/31/2014	07/29/2014
Putting On A Show For You	PA0001892889	04/29/2014	05/04/2014	05/09/2014
Rock Me Baby	PA0001907592	07/19/2014	07/25/2014	07/29/2014
Sexy In The City	PA0001905511	06/27/2014	07/02/2014	07/07/2014
So Young	PA0001877472	01/25/2014	01/31/2014	08/02/2014
Summertime Lunch	PA0001907078	07/11/2014	07/25/2014	09/21/2014
They Seem so Sweet	PA0001904151	06/15/2014	06/19/2014	07/07/2014
Tie Her Up For Me	PA0001906551	07/03/2014	07/14/2014	07/06/2014
Yours Forever	PA0001907573	07/15/2014	07/25/2014	07/29/2014
Zeppelin on Fire	PA0001874614	01/04/2014	01/05/2014	05/24/2014

Total Malibu Media, LLC Copyrights Infringed: 35